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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT TACOMA**

10 WILL CO. LTD. a limited liability company
organized under the laws of Japan,

11 Plaintiff,

12 vs.

13 KA YEUNG LEE, an individual; YOUHAHA
14 MARKETING AND PROMOTION
LIMITED, a foreign company; and DOES 1-5
15 d/b/a THISAV.COM, MISSAV.COM,
MYAV.COM, MISSAV789.com,
16 VASSIM.COM, and John Does 6-20

17 Defendants.
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Case No.: 3:21-cv-05733-BHS

**DECLARATION OF SPENCER
FREEMAN IN SUPPORT OF
PLAINTIFF WILL CO. LTD.'S *EX*
PARTE MOTION FOR ENTRY OF
DEFAULT JUDGMENT**

19 I, Spencer Freeman, declare:

20 1. I am an attorney at law licensed to practice before the Courts of the State of
21 Washington and the United States District Court Western District of Washington, Eastern District
22 of Washington, District of Colorado, Southern District of Illinois, Ninth Circuit Court of Appeals,
23 and United States Supreme Court. I am the principal attorney with the law firm of Freeman Law
24 Firm, Inc., attorneys for Plaintiff MG Premium Ltd. Unless otherwise stated, I have personal
25 knowledge of the facts contained herein this declaration and, if called and sworn as a witness,
26 could and would competently testify thereto.

DECLARATION OF SPENCER FREEMAN IN
SUPPORT OF PLAINTIFF WILL CO. LTD.'S *EX*
PARTE MOTION FOR ENTRY OF DEFAULT
JUDGMENT - 1

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98042
(253) 383-4500 - (253) 383-4501 (fax)

2. I spent the following time on this litigation:

- Draft Complaint and Initial Pleadings: 10 hours
- Draft Motion for Early Discovery: 5.2 hours
- Draft and Serve Subpoenas 4.5 hours
- Review Early Discovery Production: 2.0 hours
- Draft First Amended Complaint 2.5 hours
- Draft Motion for Alternative Service: 7.5 hours
- Draft Opposition to Motion to Dismiss: 24.8 hours
- Draft Appeal Opening Brief: 68.2 hours
- Draft Appeal Reply Brief: 29.0 hours
- Prepare and Conduct Oral Argument: 8.0 hours
- Motion for Order of Default 1.5 hours
- Motion Default Judgment 20 hours

3. My hourly rate is \$265 per hour on this matter.

4. I have practiced law for 29 years, litigating cases at all levels in the State of Washington, United States District Courts across the country, Ninth Circuit of Appeals and United States Supreme Court. I have tried over 100 jury trials. The last 24 years of my practice has included intellectual property/piracy litigation. Given my experience, a rate of \$265 per hour is quite reasonable.

5. In total, I have spent 183.2 hours on this litigation, for a total of \$48,548.00.

6. The filing fee for this case was \$400.

7. Appellate filing fee for this case was \$400.

8. Costs for paper copies of exhibits for 9th Circuit Court of Appeals was \$230.57.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

1 Execute on the 24th day of October 2024 at Tacoma, Washington.

2 Spencer D. Freeman

3 Spencer D. Freeman